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May 14, 2020

VIA ECF

The Honorable Naomi Reice Buchwald
United States District Judge
United States Courthouse
500 Pearl Street, Room 2270
New York, NY 10007

Re: Williams, et al. v. Equitable Acceptance Corp., 18-CV-07537

Dear Judge Buchwald:

We represent Defendant Equitable Corporation (“EAC”). Pursuant to Rule 2(b) of Your Honor’s Individual Practices, Defendant EAC’s response to Plaintiffs’ May 11, 2020 letter requesting a pre-motion conference [Doc. No. 86] would, by our calculation, be due today.

Plaintiffs’ pre-motion request includes a substantially expanded proposed Second Amended Complaint, three new claims, two new defendants, and raises the prospect of several additional motions.

Accordingly, we respectfully request three additional business days, or until Tuesday, May 19, 2020, to respond.

This is our first such request. We have consulted Plaintiffs who advise they do not object to this request.

Respectfully submitted,

/s Avery Samet

Avery Samet

cc: All counsel of record (*via ECF*)